

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

1) JACOB MICHAEL RICHARDSON,  
[DOB: 12/17/1987]

and

2) BRIAN MICHAEL FRENCH,  
[DOB: 09/10/1990]

Defendants.

No. \_\_\_\_\_

**COUNT ONE: (Richardson)**

***Conspiracy to Distribute 500 Grams or More of  
Methamphetamine***

21 U.S.C. §§ 841(a)(1), (b)(1)(A), and 846

NLT: 10 Years' Imprisonment

NMT: Life Imprisonment

NMT: \$10,000,000 Fine

NLT: 5 Years' Supervised Release

Class A Felony

**COUNT TWO: (Richardson)**

***Distribution of Methamphetamine***

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT: 20 Years' Imprisonment

NMT: \$1,000,000 Fine

NLT: 3 Years' Supervised Release

Class C Felony

**COUNT THREE: (Richardson)**

***Possession of a Firearm in Furtherance of a Drug  
Trafficking Crime***

18 U.S.C. §§ 924(c)(1)(A)(i)

NLT: 5 Years' Imprisonment (Consecutive)

NMT: Life Imprisonment (Consecutive)

NMT: \$250,000 Fine

NMT: 5 Years' Supervised Release

Class A Felony

**COUNT FOUR: (Richardson)**

***Possession with Intent to Distribute 50 Grams or More  
of Methamphetamine***

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT: 5 Years' Imprisonment

NMT: 40 Years' Imprisonment

NMT: \$5,000,000 Fine

NLT: 4 Years' Supervised Release

Class B Felony

**COUNT FIVE: (Richardson)**

***Possession of a Firearm in Furtherance of a Drug Trafficking Crime (Richardson)***

18 U.S.C. §§ 924(c)(1)(A)(i)

NLT: 5 Years' Imprisonment (Consecutive)

NMT: Life Imprisonment (Consecutive)

NMT: \$250,000 Fine

NMT: 5 Years' Supervised Release

Class A Felony

**COUNT SIX: (Richardson)**

***Felon in Possession of Firearms and Ammunition***

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT: 10 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

Class C Felony

**COUNT SEVEN: (French)**

***Felon in Possession of Ammunition***

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT: 10 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

Class C Felony

Plus a \$100 Special Assessment for each Count

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

***Conspiracy to Distribute 500 Grams or More of Methamphetamine***

From on or about August 20, 2019, and continuing to on or about August 20, 2020 in the Western District of Missouri and elsewhere, the defendant, JACOB MICHAEL RICHARDSON, and other persons known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed together and with each other, to distribute and possess with intent to distribute 500 grams or more of a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and 846.

**COUNT TWO**  
***Distribution of Methamphetamine***

On or about August 10, 2020, in the Western District of Missouri, the defendant, JACOB MICHAEL RICHARDSON, did knowingly and intentionally distribute a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THREE**  
***Possession of a Firearm in Furtherance of a Drug Trafficking Crime***

On or about August 10, 2020, in the Western District of Missouri, the defendant, JACOB MICHAEL RICHARDSON, in furtherance of and during and in relation to a drug trafficking crime, that is, distribution of methamphetamine, a Schedule II controlled substance, as charged in Count Two, did knowingly possess a firearm, to wit: a Springfield, model XD40, .40 caliber pistol bearing Serial Number US176521, in violation of the provisions of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT FOUR**  
***Possession with Intent to Distribute 50 Grams or More of Methamphetamine***

On or about August 20, 2020, in the Western District of Missouri, the defendant, JACOB MICHAEL RICHARDSON, did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

**COUNT FIVE**  
***Possession of Firearms in Furtherance of a Drug Trafficking Crime***

On or about August 20, 2020, in the Western District of Missouri, the defendant, JACOB MICHAEL RICHARDSON, in furtherance of and during and in relation to a drug trafficking crime, that is, possession with the intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, as charged in Count Four, did knowingly possess firearms, to wit: a Remington, model Mohawk 10, .22 caliber rifle bearing serial number 2510693; a Charles Daley, model Field, 12 gauge shotgun bearing Serial Number 3500046; and a Springfield, model

XD40, .40 caliber pistol bearing Serial Number US176521, in violation of the provisions of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT SIX**

***Felon in Possession of Firearms and Ammunition***

On or about August 10, 2020, and continuing to on or about August 20, 2020, in the Western District of Missouri, the defendant, JACOB MICHAEL RICHARDSON, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms and ammunition, to wit: a Remington, model Mohawk 10, .22 caliber rifle bearing Serial Number 2510693; a Charles Daley, model Field, 12 gauge shotgun bearing serial number 3500046; and a Springfield, model XD40, .40 caliber pistol bearing Serial Number US176521; and 29 rounds of .223 caliber ammunition, which had been transported in interstate commerce, in violation of the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT SEVEN**

***Felon in Possession of Ammunition***

On or about August 10, 2020, in the Western District of Missouri, the defendant, BRIAN MICHAEL FRENCH, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit: 29 rounds of .223 caliber ammunition, which had been transported in interstate commerce, in violation of the provisions of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

A TRUE BILL.

9/9/2020  
DATE

/s/ James Hudnall  
FOREPERSON OF THE GRAND JURY

/s/ Brandon E. Gibson  
Brandon E. Gibson  
Special Assistant United States Attorney  
Violent Crime & Drug Trafficking Unit  
Western District of Missouri